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DEFECTS INVESTIGATION

January 29, 2003

03E-005 3

Kenneth N. Weinstein, Esq. Associate Administrator for Safety Assurance National Highway Traffic Safety Administration 400 Seventh Street, S.W., Room 5321 Washington, DC 20590

Re: Part 573 Defect and Noncompliance Report

Dear Mr. Weinstein:

Dana Corporation, Commercial Vehicle Systems Division ("Dana") has determined that certain trailer axio assemblies manufactured by Dana and sold to Great Dane Trailers may contain defect related to motor vehicle safety. Pursuant to 49 C.F.R. § 573.3(e), Dana, as the original equipment manufacturer, is providing this notification and remedy on behalf of Great Dane. To date, there have been no reports of any accidents or injuries related to this defect.

The following information is submitted in accordance with 49 C.F.R. § 573.5.

(1) Manufacturer:

Dana Corporation Commercial Vehicle Systems Division P.O. Box 4097 Kalamazoo, Michigan 49003-4097 (616) 567-1088

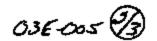
(2) Product identification:

Dana Spicer Trailer Axie Model P22LS501W7705 equipped with Dana LMS Hub Assemblies installed on certain Great Dane trailers.

(3) Recall population:

56 trailer axles equipped with the subject hub assemblies, and installed on Great Dane trailers. Dana will subject 100% of the affected axle production to inspection, and will repair or replace those wheel hub assemblies and bearings that are determined through these inspections to be incorrectly installed.

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(4) Approximate percentage of parts/vehicles containing the defect: Unknown

(5) Description of the defect:

The subject trailer axies were equipped with the wheel equipment (i.e., brakes, brake drums, wheel hubs and wheel bearings) installed by Dana. The wheel hub arrangement used on these axies was Dana's LMS (Low Maintenance System), in which a solid spacer is used between the inner and outer wheel bearing cones to establish wheel bearing endplay.

Dana determined that two axies from a population of 58 units built during the November 13 and November 14, 2002 production run were equipped with the incorrect outer wheel bearing cons. As a result, the outer wheel bearing will prematurely fail, and potentially allow the wheel to separate from the trailer.

(6) Customers supplied by Dana:

The only customer to which Dana supplied the subject extes is Great Dana Trailers. All of the trailers containing the subject extes have, in turn, been sold or leased by Great Dana to Overnite Transportation.

(7) Chronology of the principal events:

On January 2, 2003, Dana was advised by Overnite Transportation that a Dana axie (serial number E021-06138) may have been equipped with an improper outer wheel bearing cone, as evidenced by the bearing part number. On January 15, 2003, Dana was advised by Overnite Transportation that Overnite had identified a second axie (serial number E021-06139) containing an improper outer wheel bearing cone.

On or about January 20, 2003, Dana received the serial number for the second axle. Upon further investigation, using the serial number data, Dana determined that both axles were assembled during the same production run et Dana's plant in Montgomery, Alabama on November 13 and 14, 2002.

On January 23, 2003, Dana made the determination that the subject extes may contain a sefety-related defect.

Dana is reviewing its quality control processes in an effort to avoid this type of problem in the future. Dana is aware of no accidents or injuries relating to this defect.

(8) Remedy for the defect:

Dane has notified Great Dane of this matter, and has provided Great Dane with the serial numbers of the potentially affected axies. Dane has been advised that the entire population of trailers equipped with the affected trailer axies was shipped by Great Dane to Overnite Transportation. Dane has further been

advised that Overnite Transportation has identified each of these units within its fleet.

Dana has provided Overnite with a preliminary copy of a written notification inspection procedure which may be used to identify any additional defective axles among the population of 56 axles shipped to Great Dane. The inspection process consists of parking the trailers on a level surface, reising the trailer with a jack until the tires are off the ground, releasing the trailer brakes and checking for excessive wheel bearing endplay. If a unit with excessive endplay is detected, the remedy will be to remove the entire wheel hub assembly and bearings and replace them with the correct part to be supplied by Dana.

Dana will provide replacement parts free of charge, and will reimburse Overnite Transportation for reasonable labor charges relating to the inspections and, if applicable, removing and replacing the affected wheel hub assemblies and bearings.

(9) Part 577 Notice Letter and Pre-Recall Remedy Reimbursement Plan

Dana will submit its proposed Owner Notification Letter and a copy the applicable Pre-Recall Remedy Reimbursement Plan to NHTSA shortly.

Please advise the undersigned of the campaign number assigned to this recall by the Office of Defects Investigation.

Senior Counsel